

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

EDMAR FINANCIAL COMPANY, LLC;  
IRISH BLUE & GOLD, INC.; and XTX  
MARKETS LIMITED,

Plaintiffs,

vs.

CURRENEX, INC.; GOLDMAN SACHS &  
CO. LLC; HC TECHNOLOGIES, LLC;  
STATE STREET BANK AND TRUST  
COMPANY; STATE STREET GLOBAL  
MARKETS INTERNATIONAL LIMITED;  
and JOHN DOE DEFENDANTS 1-5,

Defendants.

Case No. 21-cv-06598-LAK

**[PROPOSED] ORDER GRANTING MOTION FOR ISSUANCE OF A LETTER OF  
REQUEST PURSUANT TO THE HAGUE CONVENTION ON THE TAKING OF  
EVIDENCE ABROAD IN CIVIL OR COMMERCIAL MATTERS DATED MARCH 18,  
1970**

The Court, having reviewed Plaintiffs' Motion for Issuance of a Letter of Request Pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters Dated March 18, 1970, as well as papers in support, HEREBY ORDERS THAT:

1. The Motion is GRANTED.
2. The Request for Judicial Assistance Pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters Dated March 18, 1970 attached as Exhibit 1 to the Declaration of Daniel L. Brockett, dated June 23, 2025, is hereby issued as the Court's "Letter of Request" and is fully incorporated herein.
3. The signed Order and the Letter of Request will be given to Quinn Emanuel Urquhart & Sullivan, LLP, who will cause both documents to be filed with The Senior Master,

For the attention of the Foreign Process Section, Room E16, Royal Courts of Justice, Strand,  
LONDON WC2A 2LL, England.

4. Any stipulation or protective order governing confidentiality in this action shall apply to the deposition, including the transcript and video.

5. This Order, Russell Sears' production of documents, the deposition of Russell Sears, or the terms of the Letter of Request (which are incorporated into this Order) shall not be construed or operate as a waiver of any argument, position, objection, allegation, or claim or defense of any party in the above-captioned action, or of the attorney-client privilege, the work product doctrine, or any other privileges, rights, protections, or prohibitions that may apply to that evidence under the laws of the United Kingdom, the United States of America, or the State of New York.

IT IS SO ORDERED.

DATED: June \_\_\_, 2025

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THE HONORABLE LEWIS A. KAPLAN  
UNITED STATES DISTRICT JUDGE